

1 **SAO**
2 LESLIE MARK STOVALL, ESQ.
3 Nevada Bar No. 2566
4 STOVALL & ASSOCIATES
5 2301 Palomino Lane
6 Las Vegas, NV 89107
7 (702) 258-3034
8 (702) 258-0093 Facsimile
9 Eservice: court@lesstovall.com
10 *Attorneys for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 FRONT SIGHT MANAGEMENT, LLC)
14 dba. Front Sight Firearms Training Institute,)

15 Plaintiff)

16 vs.)

17 State of Nevada)

18 Defendant,)

CASE NO: 2:20-CV-01921-RFB-EJY

19 **STIPULATION AND ORDER TO EXTEND THE TIME FOR RESPONSES AND**
20 **REPLIES ON SEVERAL OUTSTANDING MOTIONS**

21 **(Third Request)**

22 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN plaintiff FRONT
23 SIGHT MANAGEMENT, LLC., by and through its attorney LESLIE MARK STOVALL, ESQ.
24 and defendant, STATE OF NEVADA, by and through its attorney CRAIG A. NEWBY, ESQ.
25 and SABRINA K. CLINTON, ESQ. and hereby stipulate to the following:
26
27
28

1. Plaintiff's Response to Defendant's Motion to Dismiss [ECF 7] currently due on January 15, 2021 to be continue to 14 days following the court's decision on plaintiff's motion for abstention [ECF No. 9 and 17] and Motion for Remand [ECF No. 10].
2. Defendant's Responses to Plaintiff's Motion for Abstention [ECF No. 9 and 17] and Motion for Remand [ECF No. 10] currently due on January 22, 2021 to be due on January 29, 2021 and Plaintiff's will have to and including February 5, 2021 to file its replies.

DATED this 14th day of January, 2021.

DATED this 14th day of January, 2021.

STOVALL & ASSOCIATES

OFFICE OF THE ATTORNEY GENERAL

/s/ Leslie Mark Stovall

/s/ Sabrina K. Clinton

LESLIE MARK STOVALL, ESQ.
Nevada Bar No. 2566
2301 Palomino Lane
Las Vegas, NV 89107
Telephone: (702) 258-3034
Attorney for Plaintiff

SABRINA K. CLINTON, ESQ.
Nevada Bar No.
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
Telephone: 702-4863420
Attorney for Defendant

ORDER

IT IS HEREBY ORDERED

DATED this 16th day of January, 2021.


THE HONORABLE RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Maria Hernandez

From: Sabrena K. Clinton <SClinton@ag.nv.gov> on behalf of Sabrena K. Clinton
Sent: Thursday, January 14, 2021 1:53 PM
To: Maria Hernandez; Craig A. Newby
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Thank you. You have permission to affix the electronic signature for submission.

Regards,

Sabrena Clinton

From: Maria Hernandez <maria@lesstovall.com>
Sent: Thursday, January 14, 2021 1:49 PM
To: Sabrena K. Clinton <SClinton@ag.nv.gov>; Craig A. Newby <CNewby@ag.nv.gov>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Afternoon Ms. Clinton,

It was a pleasure speaking with you. Enclosed please find the edited version for your review and signature if agreeable to you.

Thank you

Maria Hernandez



maria@lesstovall.com
www.lesstovall.com
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2301 Palomino Lane
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F: (702) 258-0093

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From: Sabrena K. Clinton <SClinton@ag.nv.gov>
Sent: Tuesday, January 12, 2021 12:03 PM
To: Maria Hernandez <maria@lesstovall.com>; Craig A. Newby <CNewby@ag.nv.gov>
Subject: Re: Front Sight v. State of Nevada- Stipulation and Order

Hello:

I'm in a seminar today so I am only checking my email intermittently. We are amenable to Mr. Stovall's proposal. Please forward a proposed stipulation for review.

Regards,

Sabrena Clinton

From: Maria Hernandez <maria@lesstovall.com>
Sent: Tuesday, January 12, 2021 7:56 AM
To: Craig A. Newby <CNewby@ag.nv.gov>; Sabrena K. Clinton <SClinton@ag.nv.gov>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Morning,

Mr. Stovall would like to know if you are willing to stipulate to the following:

1. That plaintiff file its opposition to defendant's motion to dismiss after the Motion for Abstention is heard by the judge and a decision is made.
2. That all pending oppositions and replies be moved

Please advise if agreeable to you.

Thank you

Maria Hernandez



maria@lesstovall.com
www.lesstovall.com

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From: Craig A. Newby <CNewby@ag.nv.gov>
Sent: Wednesday, December 9, 2020 12:46 PM
To: Maria Hernandez <maria@lesstovall.com>; Sabrena K. Clinton <SClinton@ag.nv.gov>
Subject: Re: Front Sight v. State of Nevada- Stipulation and Order

This works for me. Please add my e-signature for purposes of filing.

Happy holidays!

Craig

From: Maria Hernandez <maria@lesstovall.com>
Sent: Wednesday, December 9, 2020 12:41 PM
To: Craig A. Newby <CNewby@ag.nv.gov>; Sabrena K. Clinton <SClinton@ag.nv.gov>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Afternoon Mr. Newby,

Enclosed please find the proposed stipulation and order for your review and signature if agreeable to you.

Thank you

Maria Hernandez



maria@lesstovall.com
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From: Craig A. Newby <CNewby@ag.nv.gov>
Sent: Wednesday, December 9, 2020 10:15 AM
To: Maria Hernandez <maria@lesstovall.com>; Sabrena K. Clinton <SClinton@ag.nv.gov>
Subject: Re: Front Sight v. State of Nevada- Stipulation and Order

Hello Maria:

Of course. To avoid having to address replies during his quarantine, I would suggest that we also extend the response date for Front Sight's pending motions as well.

Thank you and happy holidays,

Craig

From: Maria Hernandez <maria@lesstovall.com>
Sent: Wednesday, December 9, 2020 10:06 AM
To: Sabrena K. Clinton <SClinton@ag.nv.gov>
Cc: Craig A. Newby <CNewby@ag.nv.gov>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Morning Ms. Clinton,

Our office is respectfully requesting a 30 day extension of time for plaintiff to file its opposition to defendant's motion to dismiss. Mr. Stovall is in quarantine, he is over the age of 65 years old and with the holidays time is limited. Please advise if agreeable to you, if so I will send a stipulation for your signature. I am looking forward to hearing from you.

I greatly appreciate your courtesy and understanding during this difficult times.

Sincerely,

Maria Hernandez



maria@lesstovall.com
www.lesstovall.com
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From: Sabrena K. Clinton <SClinton@ag.nv.gov>
Sent: Friday, November 20, 2020 2:02 PM
To: Maria Hernandez <maria@lesstovall.com>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Thank you. Same to you.

From: Maria Hernandez <maria@lesstovall.com>
Sent: Friday, November 20, 2020 12:20 PM
To: Sabrena K. Clinton <SClinton@ag.nv.gov>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

No problem,

Have a nice weekend.

Maria Hernandez



maria@lesstovall.com

www.lesstovall.com

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From: Sabrena K. Clinton <SClinton@ag.nv.gov>

Sent: Friday, November 20, 2020 11:52 AM

To: Maria Hernandez <maria@lesstovall.com>

Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Thank you. I must have missed this.

From: Maria Hernandez <maria@lesstovall.com>

Sent: Friday, November 20, 2020 11:45 AM

To: Sabrena K. Clinton <SClinton@ag.nv.gov>

Subject: FW: Front Sight v. State of Nevada- Stipulation and Order

Please see email below.

Maria Hernandez



maria@lesstovall.com

www.lesstovall.com

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From: Maria Hernandez <maria@lesstovall.com>
Sent: Thursday, November 19, 2020 10:06 AM
To: 'Sabrena K. Clinton' <SClinton@ag.nv.gov>
Cc: 'Craig A. Newby' <CNewby@ag.nv.gov>; Les Stovall <les@lesstovall.com>
Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Morning Ms. Clinton,

Mr. Stovall has no objection. He authorizes you to a-fix his electronic signature.

Thank you so much.

Maria Hernandez



maria@lesstovall.com
www.lesstovall.com
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From: Sabrena K. Clinton <SClinton@ag.nv.gov>
Sent: Wednesday, November 18, 2020 4:17 PM
To: Maria Hernandez <maria@lesstovall.com>
Cc: Craig A. Newby <CNewby@ag.nv.gov>; Les Stovall <les@lesstovall.com>
Subject: Front Sight v. State of Nevada- Stipulation and Order

Ms. Hernandez:

Before submitting the stipulation and order, I have a point of clarification. The motion(s) for abstention, ECF No. 9 and ECF No. 17, are substantively the same. We intend to respond to both in one filing. To avoid any confusion with the court, I have specifically referenced both document numbers in the stipulation and order. Please see the attached and if Mr. Stovall has no objection, we will submit as previously authorized. Thank you.

Regards,

Sabrena K. Clinton
Deputy Attorney General
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101

702-486-5708

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